

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**JOHN ACE JONES,**  
**INDIVIDUALLY AND ON BEHALF**  
**OF ALL OTHERS SIMILARLY**  
**SITUATED,**

**Plaintiff,**

**v.**

**FINANCIAL ASSET**  
**MANAGEMENT SYSTEMS, INC.**  
**Defendant.**

**Case No.: 1:18-cv-05784-AT-CCB**

**CLASS ACTION  
COMPLAINT**

**JURY TRIAL DEMANDED**

**DECLARATION OF JENNIFER AUER JORDAN**

1. My name is Jennifer Auer Jordan and I am a founding partner of Shamp Jordan Woodward, LLC where I specialize in complex trial and appellate advocacy. I submit this declaration in support of Plaintiff's Motion for Class Certification.
2. My background information and qualifications are as follows.
3. I am an attorney licensed to practice law in the State of Georgia and am a member in good standing of the State Bar of Georgia. I was admitted to practice law in 2001.
4. I graduated *magna cum laude* from the University of Georgia School of Law in 2001 where I was an Editorial Board Member and Articles

Editor for the Georgia Law Review member. After graduation, I served as a law clerk to the Honorable Anthony A. Alaimo, U.S. District Court Judge for the Northern District of Georgia, Atlanta Division, from 2001 to 2002. Since that time, I have been engaged in the private practice of law in the State of Georgia and have had primarily a complex civil litigation practice, including consumer class actions, representing both plaintiffs and defendants in state and federal courts in the metro-Atlanta area.

5. In addition to my law practice, I serve as a Georgia State Senator and am currently the Chairwoman of the Senate Special Judiciary Committee. I also serve on the Senate's Appropriations Committee and Judiciary Appropriations Subcommittee. I am a member of the Board of Governors for the State Bar of Georgia and representing the Atlanta-area since 2015. I am also a Master with the Joseph Henry Lumpkin American Inn of Court.
6. I serve as class counsel for Plaintiff with Co-counsel Ronald Daniels and Clifford Carlson ("class counsel").
7. Class counsel has extensive experience in the two areas of expertise at play in this case: consumer debt cases and class actions. Class counsel and their respective firms have been recognized for the quality of their

work in various industry publications based on client and peer reviews, on a state and national basis.

8. The undersigned has served as class counsel on at least 20 state and federal class actions. Indeed, my reported cases include two that were consumer class actions filed against payday lenders. *USA Payday Cash Advance Center #1, Inc. v. Evans*, 281 Ga.App. 847 (2006) and *Georgia Cash America, Inc. v. Strong*, 286 Ga.App. 405 (2007).
9. My experience in the area of consumer class actions has even qualified me to serve as an expert in the area of consumer class actions.

SUBMITTED on the 25th day of September, 2019.

/s/Jennifer Auer Jordan  
Jennifer Auer Jordan  
Ga. Bar No. 027857